



Cory Morris <coryhmorris@gmail.com>

Failure to Comply with Court Order/Discovery Obligations

1 message

Cory Morris <coryhmorris@gmail.com>

Mon, Dec 9, 2024 at 8:59 AM

To: "Reissman, Ralph J" <rreissman@nassaucountyny.gov>, Cory Morris <coryhmorris@gmail.com>, Victor John Yannacone jr <vyannacone@yannalaw.com>, barrister <barrister@yannalaw.com>, Richard Kosowski <ruleoflawnews@gmail.com>, "Rozea, Matthew" <MRozea@nassaucountyny.gov>

Good Morning:

I hope this message finds you well and I write, after no less than six (6) correspondence and as per our meet and confer conversation on November 18, 2024 after which The Court Ordered you to produce records. Kindly provide the below by the close of business or let us meet and confer again concerning:

- Please identify and produce someone for deposition(s) with knowledge as to the intelligence bulletins, the practice, policies and guidelines concerning the creation and maintenance of the intelligence bulletins as more fully described in our 30(b)(6) notice of deposition;
- Now that the Judge has ruled, and production is now due/overdue, we require the responses to discovery that are outstanding and a privilege log if not anticipated motion practice concerning a protective order all of us agreeing that Plaintiff/Plaintiff's counsel is not looking for social security, telephone numbers, home addresses, dates of birth, etc., that should not inhibit the production of records;
- Your consent to amend the complaint provided to you nearly a month ago;
- Your portion of the joint status letter as per Court Order: "On December 13, 2024, counsel are directed to submit a joint letter indicating the status of the requested documents," and
- the Court Ordered production due December 2, 2024 and today, December 9, 2024; specifically where the Court Ordered: "by December 9, 2024, Defendants shall either provide the Intelligence Bulletins with the following limitations: limited to within a three-year period of Plaintiff's arrest and redacted to withhold the names of private individuals; or, produce a privilege log."

Thank you very much. I hope you are well and look forward to hearing from you by the close of business today.

Sincerely,

Cory Morris

On Mon, Dec 2, 2024 at 11:16 AM Cory Morris <coryhmorris@gmail.com> wrote:

Good morning:

I hope this message finds you well and I hope you had a pleasant thanksgiving. I expected your portion of a joint letter last week. Accordingly, and in tandem with the Court Order requiring your written response, I write in a final effort to resolve the discovery dispute (inclusive of the fact that we have not received your response to our discovery demands that are long overdue) for which we anticipated your response/portion of a joint letter as the local and individual rules require.

Thank you very much. I hope you are well and I look forward to hearing from you before the close of business today. Should you have any questions or concerns, the fastest way to reach me is to either ask here or respond to this message with some time(s) good for a conversation.

Sincerely,
Cory Morris

On Tue, Nov 26, 2024 at 4:45 PM Cory Morris <coryhmorris@gmail.com> wrote:

As per our meet and confer concerning Defendants failure to comply with the Federal Rules of Civil Procedure and the below:

- we expect by tomorrow, no later than 2:00 PM the identity of someone who will be produced for deposition(s) with knowledge as to the intelligence bulletins, the practice, policies and guidelines concerning the creation and maintenance of the intelligence bulletins as more fully described in our 30(b)(6) notice of deposition; and
- we expect by tomorrow, no later than 2:00 PM the discovery production that is due/overdue; we require the responses to discovery that are outstanding and a privilege log if not anticipated motion practice concerning a protective order all of us agreeing that Plaintiff/Plaintiff's counsel is not looking for social security, telephone numbers, home addresses, dates of birth, etc., that should not inhibit the production of records; and
- we understand that you will consent to the amendment of the complaint and we thank for your time and cooperation.

Please know that if police legal will not cooperate with you, we will cooperate with your office insofar as the submission of a joint status letter to the court before undertaking motion practice.

Thank you very much. I hope you are well and look forward to hearing from you soon.

Sincerely,
Cory Morris

On Tue, Nov 26, 2024 at 3:11 PM Cory Morris <coryhmorris@gmail.com> wrote:

Mr. Reissman and Mr. Rozea - we are without discovery responses, among other things, that were required before today. Kindly respond before Two PM tomorrow to avoid unnecessary judicial intervention.

To add, we already voluntarily withdrew defendants' default in this action. Kindly provide us the courtesy of a response if not an explanation here.

Thank you. I look forward to hearing from you.

Cory Morris

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On Tue, Nov 26, 2024 at 2:30 PM Cory Morris <coryhmorris@gmail.com> wrote:

Good Afternoon:

I hope this message finds you well and I write this second request since yesterday as per our meet and confer conversation last week, November 18, 2024. Please let us meet and confer concerning Defendants failure to comply with the Federal Rules of Civil Procedure and the below:

- Please identify and produce someone for deposition(s) with knowledge as to the intelligence bulletins, the practice, policies and guidelines concerning the creation and maintenance of the intelligence bulletins as more fully described in our 30(b)(6) notice of deposition; and

- Now that the Judge has ruled, and production is now due/overdue, we require the responses to discovery that are outstanding and a privilege log if not anticipated motion practice concerning a protective order all of us agreeing that Plaintiff/Plaintiff's counsel is not looking for social security, telephone numbers, home addresses, dates of birth, etc., that should not inhibit the production of records; and
- Your consent to amend the complaint.

Please respond or let us meet and confer before the close of business today.

Thank you very much. I hope you are well and look forward to hearing from you soon.

Sincerely,
Cory Morris

On Mon, Nov 25, 2024 at 2:32 PM Cory Morris <coryhmorris@gmail.com> wrote:

Good Afternoon:

I hope this message finds you well and I write as per our meet and confer conversation last week, November 18, 2024. Kindly provide the below by the close of business or let us meet and confer again concerning:

- Please identify and produce someone for deposition(s) with knowledge as to the intelligence bulletins, the practice, policies and guidelines concerning the creation and maintenance of the intelligence bulletins as more fully described in our 30(b)(6) notice of deposition; and
- Now that the Judge has ruled, and production is now due/overdue, we require the responses to discovery that are outstanding and a privilege log if not anticipated motion practice concerning a protective order all of us agreeing that Plaintiff/Plaintiff's counsel is not looking for social security, telephone numbers, home addresses, dates of birth, etc., that should not inhibit the production of records; and
- Your consent to amend the complaint.

Thank you very much. I hope you are well and look forward to hearing from you soon.

Sincerely,
Cory Morris

On Mon, Nov 18, 2024 at 10:01 AM Cory Morris <coryhmorris@gmail.com> wrote:

Good morning:

I hope this message finds you well and I write to memorialize our meet and confer conversation regarding the below:

- Depositions we discussed and agreed that you would identify and produce someone with knowledge as to the intelligence bulletins, the practice, policies and guidelines concerning the creation and maintenance of the intelligence bulletins as more fully described in our 30(b)(6) notice of deposition;
- Lack of Probable Cause: You have and you will review the November 14, 2024 case we provided as it relates to the lack of probable cause;
- Production of Records/Outstanding Discovery Demand: After we hear from the judge, we can anticipate both the responses to discovery that are outstanding and a privilege log if not anticipated motion practice concerning a protective order. We both agree that Plaintiff/Plaintiff's counsel is not looking for social security, telephone numbers, home addresses, dates of birth, etc., that should not inhibit the production of records.
- Amending the Complaint: We sent you a copy and I understand Defendants' will likely consent to that short amendment consistent with the federal rules; we hope to have an answer by our 2 PM oral argument.

Thank you very much. I hope you are well and look forward to speaking with you again soon.

Sincerely,
Cory Morris

On Sun, Nov 17, 2024 at 4:27 PM Cory Morris <coryhmorris@gmail.com> wrote:

(FYI) - Also on our slab for tomorrow

205

----- Forwarded message -----

From: **Victor John Yannacone jr** <vyannacone@yannalaw.com>
Date: Thu, Oct 31, 2024 at 6:25 PM
Subject: Kosowski: deposition notices
To: Ralph Reissman <RReissman@nassaucountyny.gov>
Cc: Cory Morris <coryhmorris@gmail.com>

Attached for service upon you are notices to take depositions. Please call Attorney Morris and arrange convenient dates and times.

Victor John Yannacone, jr., **Attorney**
1-516-551-0764 (direct after 1600 Eastern)
<https://yannalaw.com>

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Cory Morris

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